



STRATEGIC PLAN

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

Northern Trust Bank, N. A.
Charter Number: 17949

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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated "Satisfactory."

The major factors that support this rating include:

- The bank met its lending goals for "satisfactory" performance in 1999 and 2000, and substantially met its lending goals for "outstanding" performance in 2001.
- The bank met its investment goals for "satisfactory" performance in 1999 and 2000, and met its investment goals for "outstanding" performance in 2001.
- The bank met its service goals for "satisfactory" performance in 1999 and 2000, and met its service goals for "outstanding" performance in 2001.

Description of Institution

Northern Trust Bank, N.A. (NTB) is a mid-size, interstate bank headquartered in Phoenix, Arizona and a subsidiary of Northern Trust Corporation (NTC). NTC is a \$39 billion multi-bank holding company located in Chicago, Illinois, with \$1.7 trillion in trust assets and subsidiaries in 12 states and five countries. In February 2002, Northern Trust Bank of Colorado, a \$98 million state-chartered affiliate, merged into Northern Trust Bank of Arizona, N.A. The resulting institution was renamed Northern Trust Bank, N.A.

NTB's business strategy focuses primarily on trust and private banking services. The bank's approach is not to compete on the basis of retail banking products and convenience, but to compete on the basis of personal service. Its customer base is primarily comprised of trust customers, high income professionals, and emerging affluent. Banking business is primarily developed through cross-selling to and referrals from existing customers. The bank's offices are located near its trust customer base and referral sources, generally in upscale financial centers or near retirement areas. Loan product offerings include mortgage loans for one-to-four family and multi-family residences, home equity lines of credit, commercial loans and lines of credit, and consumer loans. Deposit product offerings consist of various interest-bearing and noninterest-bearing accounts for personal and business use.

Based on March 31, 2002 financial data, NTB has total assets of \$1.0 billion, with \$672 million in total deposits and \$78 million in Tier 1 capital. Trust assets under administration total \$6.3 billion. The bank has \$897 million in total loans, with a loans-to-assets ratio of 87 percent and a loans-to-deposits ratio of 133 percent. The loan portfolio is comprised primarily of real estate loans (84 percent), with the remainder in commercial and industrial loans (8 percent), consumer loans (5 percent), and other loans (3 percent). Real estate loans consist of one-to-four family residential loans (82 percent), commercial real estate loans (13 percent), construction and development loans (4 percent), and multi-family residential loans (1 percent).

NTB delivers trust and banking services through a total of 12 offices and 11 automated teller machines (ATMs) within the metropolitan areas of Phoenix, Arizona; Tucson, Arizona; and Denver, Colorado. Within the Phoenix metropolitan area, the bank operates seven full-service offices, two limited-service offices at retirement centers, and eight ATMs. Within the Tucson metropolitan area, the bank operates two full-service offices and two ATMs. In addition, the bank operates one full-service office and one ATM in the Denver metropolitan area.

The bank's business strategy does not generate customers on a walk-in basis; therefore, NTB's approach to community reinvestment is structured around outreach activities. Through these outreach activities, the bank builds and maintains relationships with local community organizations and leaders to help meet the credit and community development needs of its assessment areas (AAs). Most of the bank's affordable mortgage loan business is generated by referrals from partnerships with these organizations. Other community reinvestment activities, such as community development investments and services, are also manifested from these relationships. There are no legal, financial, or other impediments that would prevent the bank from meeting the credit needs of its AAs.

NTB was rated "Satisfactory" at its last CRA evaluation dated July 6, 1999. The last evaluation reflected the bank's performance during 1998.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period covers NTB's performance during 1999, 2000, and 2001. Performance goals for 1999 and 2000 are set forth in the bank's three-year strategic plan effective January 1, 1998 and approved by the OCC on April 20, 1998. Performance goals for 2001 are set forth in the bank's three-year strategic plan effective January 1, 2001 and approved by the OCC on January 9, 2001. A copy of the current strategic plan is available in the bank's public file.

The strategic plans cover the Metro Phoenix and Metro Tucson AAs and include performance goals for home mortgage loans, small business loans, community development loans, qualified investments, and community development services. Qualified investments include investments allocated to the bank from its holding company.

The strategic plans do not reflect the recent merger of Northern Trust Bank of Colorado into NTB. Because of the limited time since the February 2002 merger, sufficient data were not available to perform a meaningful analysis of the bank's performance in the new AA created as a result of the merger. Therefore, we did not evaluate the bank's performance in the Metro Denver AA in Colorado.

Refer to Appendix A for additional information regarding the scope of the evaluation.

Data Integrity

As part of this evaluation, we tested for accuracy a representative sample of NTB's publicly filed data on home mortgage loans and small business loans. The bank's home mortgage and small business loan data are substantially correct and reliable; therefore, this evaluation is based on accurate data.

We also verified information on the bank's community development loans, qualified investments, and community development services to ensure the activities met the regulatory criteria. NTB had accurately identified its community development loans, qualified investments, and community development services.

Selection of Areas for Full-Scope Review

We performed a full-scope review of NTB's performance in the Metro Phoenix and Metro Tucson AAs. As stated above, we did not evaluate the bank's performance in the Metro Denver AA due to the limited time it has been part of the bank.

Ratings

NTB's overall rating is based on the measurement criteria specified in its strategic plans. While separate lending goals are specified for each AA, the performance measurement criteria are based on aggregate AA goals for rating purposes. Investment and service goals are specified for the aggregate AA only.

1999 and 2000 Rating Criteria:

The strategic plan covering 1999 and 2000 performance goals specifies measurement criteria that constitute “satisfactory” performance. No measurement criteria are specified for “outstanding” performance.

“Satisfactory” performance (substantially all goals have been met):

- At least 90 percent of the aggregate loan goals in number or dollar met with reasonable explanations for shortfalls in any area less than 90 percent;
- At least 90 percent of service goals met; and
- At least 90 percent of investment goals met.

2001 Rating Criteria:

The strategic plan covering 2001 performance goals specifies measurement criteria that constitute both “satisfactory” and “outstanding” performance.

“Satisfactory” performance (substantially all goals have been met):

- At least 90 percent of the aggregate loan goals in each category met with reasonable explanations for shortfalls in any area less than 90 percent;
- All service goals met; and
- At least 90 percent of total investment goals met.

“Outstanding” performance (all goals have been exceeded):

- At least 115 percent of the aggregate loan goals in each category met;
- All service goals met; and
- All total investment goals met.

Fair Lending Review

We performed an analysis of recent home mortgage and small business lending data, public comments, and consumer complaint information, according to the OCC's risk-based fair lending approach. Based on our analysis of the information, we determined that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam of NTB was performed in 1999.

Conclusions with Respect to Performance

LENDING GOALS

NTB met its lending goals for “satisfactory” performance in 1999 and 2000, and substantially met its lending goals for “outstanding” performance in 2001.

1999 Performance:

Refer to Table 1 in Appendix C for data and facts used to evaluate the bank’s actual performance in comparison to its lending goals for 1999.

Aggregate loans significantly exceeded the criterion for satisfactory performance in both number and dollar amount. Affordable mortgage loans and small business loans exceeded, and community development loans substantially met, the satisfactory criterion in both number and dollar amount.

2000 Performance:

Refer to Table 2 in Appendix C for data and facts used to evaluate the bank’s actual performance in comparison to its lending goals for 2000.

Aggregate loans significantly exceeded the criterion for satisfactory performance in both number and dollar amount. Affordable mortgage loans, small business loans, and community development loans exceeded the satisfactory criterion in both number and dollar amount.

2001 Performance:

Refer to Tables 3, 4, and 5 in Appendix C for data and facts used to evaluate the bank’s actual performance in comparison to its lending goals for 2001.

Aggregate mortgage loans to low- and moderate-income borrowers significantly exceeded the criterion for outstanding performance in both number and dollar amount. The number of aggregate mortgage loans in low- and moderate-income census tracts substantially met, and the dollar amount exceeded, the criterion for satisfactory performance.

Aggregate small business loans exceeded the criterion for outstanding performance in both number and dollar amount. Aggregate new loans exceeded the satisfactory criterion, and aggregate renewed loans significantly exceeded the outstanding criterion, in both number and dollar amount. In the subcategory of aggregate new loans for \$100,000 or less, the number of loans substantially met, and the dollar amount exceeded, the satisfactory criterion. In the subcategory of aggregate new loans over \$100,000 to \$250,000, both the number and dollar amount substantially met the outstanding criterion. In the subcategory of aggregate new loans over \$250,000 to \$1 million, both the number and dollar amount significantly exceeded the outstanding criterion. Aggregate new loans to businesses with revenues of \$1 million or less exceeded the satisfactory criterion in number and significantly exceeded the outstanding criterion in dollar amount. Similarly, aggregate new loans in low- and moderate-income census tracts exceeded the satisfactory criterion in number and significantly exceeded the outstanding criterion in dollar amount.

Aggregate community development loans significantly exceeded the criterion for outstanding performance in both number and dollar amount.

INVESTMENT GOALS

NTB met its investment goals for “satisfactory” performance in 1999 and 2000, and met its investment goals for “outstanding” performance in 2001.

Refer to Table 6 in Appendix C for data and facts used to evaluate the bank’s actual performance in comparison to its investment goals for 1999, 2000, and 2001.

Total investments in 1999 exceeded the criterion for satisfactory performance. Short-term and long-term investments each exceeded the satisfactory criterion.

Total investments in 2000 significantly exceeded the criterion for satisfactory performance. Short-term and long-term investments each significantly exceeded the satisfactory criterion.

Total investments in 2001 exceeded the criterion for outstanding performance. Short-term and long-term investments each exceeded the outstanding criterion.

SERVICE GOALS

NTB met its service goals for “satisfactory” performance in 1999 and 2000, and met its service goals for “outstanding” performance in 2001.

Refer to Table 7 in Appendix C for data and facts used to evaluate the bank’s actual performance in comparison to its service goals for 1999, 2000, and 2001.

Technical assistance hours and number of seminars significantly exceeded the criterion for satisfactory performance in both 1999 and 2000. In 2001, technical assistance hours exceeded, and number of seminars met, the criterion for outstanding performance.

Appendix A: Scope of Evaluation

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the assessment areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	January 1, 1999 through December 31, 2001	
Financial Institution	Products Reviewed	
Northern Trust Bank, N.A. (NTB) Phoenix, Arizona	Home Mortgage Loans Small Loans to Businesses Community Development Loans Qualified Investments Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Northern Trust Corporation (NTC)	Holding Company	Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Metro Phoenix Metro Tucson Metro Denver	Full Scope Full Scope N/A	See narrative portion of this evaluation for explanation.

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

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Metro Phoenix

Demographic Information for Full-Scope Area: Metro Phoenix						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	442	5.43	22.40	38.91	32.35	0.90
Population by Geography	2,029,526	4.01	23.95	40.96	30.91	0.18
Owner-Occupied Housing by Geography	489,330	1.68	18.13	43.93	36.26	0.00
Businesses by Geography	103,769	5.05	21.51	36.67	36.14	0.64
Farms by Geography	2,049	2.54	16.01	42.46	38.90	0.10
Family Distribution by Income Level	528,969	18.61	18.10	23.27	40.02	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	194,215	6.79	35.72	41.91	15.58	0.00
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below the Poverty Level	= \$ 35,425 = \$ 54,900 = 10.68%	Median Housing Value Unemployment Rate		= \$ 87,096 = 3.02%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2001 HUD updated MFI.

The Metro Phoenix AA consists of a portion of the Phoenix-Mesa, Arizona Metropolitan Statistical Area (MSA), which is comprised of Maricopa and Pinal Counties. The AA is defined as the contiguous census tracts within the following city and town boundaries: Chandler, El Mirage, Gilbert, Glendale, Guadalupe, Luke Air Force Base, Mesa, Paradise Valley, Peoria, Phoenix, Scottsdale, Sun City, Sun City West, Sun Lakes, Surprise, Tempe, and Youngtown. The AA comprises 95 percent of the population in Maricopa County.

NTB operates seven full-service offices within the AA. Specifically, there is one in Mesa, one in Phoenix, two in Scottsdale, two in Sun City, and one in Sun Lakes. Two limited-service offices are located at retirement centers, one in Scottsdale and one in Sun City. The bank also has eight ATMs, which are located at the seven full-service offices and one retirement center. As of June 30, 2001, 83 percent of NTB's deposits were derived from its offices in this AA. Over the evaluation period, 58 percent of the bank's home mortgage loans and 62 percent of its small business loans were derived from this AA.

NTB's deposits in the AA total \$490 million. Based on FDIC deposit market share data as of June 30, 2001, this equates to a 1.47 percent deposit market share and ranks the bank as the 10th largest deposit taking institution in the AA. The data also show that there is intense banking competition in the AA. There are 55 banks in the AA with a total of 557 offices. Together, the top three banks capture over 70 percent deposit market share in the AA.

Based on 2000 aggregate data, the competition for home mortgage loans and small business loans is also intense. There are 563 home mortgage loan originators and 233 small business loan originators in the AA. NTB ranks 95th with a market share of 0.21 percent in home mortgage loans, and ranks 26th with a market share of 0.19 percent in small business loans. The top 10 home mortgage loan originators, which capture a combined market share of 35 percent, consist of large nation-wide and regional banks and mortgage companies. The top two small business loan originators, which dominate the AA with a combined market share of 49 percent, are nation-wide credit card banks.

During 2001, the unemployment rate for the AA averaged 3.9 percent, compared to the state unemployment rate of 4.7 percent and the national unemployment rate of 4.8 percent. Major industries include services (42 percent), retail trade (19 percent), finance, insurance, and real estate (11 percent), and construction (9 percent).

As part of the strategic plan approval process, NTB prepared a comprehensive analysis of credit and community development needs and opportunities within the AA. Identified unmet needs include small business loans, flexible loans for affordable housing, and community development loans, investments, and services. Opportunities exist to make affordable housing and small business loans, and to make loans to, invest in, and provide services to various projects, programs, and organizations that have a community development purposes. However, due to the large number of banks and other lenders in the AA, competition for these opportunities is high. Please refer to the bank's current strategic plan in its public file for further details on its analysis of AA needs and opportunities.

Metro Tucson

Demographic Information for Full-Scope Area: Metro Tucson						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	102	7.84	29.41	33.33	29.41	0.00
Population by Geography	601,107	4.48	28.52	32.89	34.12	0.00
Owner-Occupied Housing by Geography	138,705	2.08	19.95	35.09	42.88	0.00
Businesses by Geography	25,421	7.51	26.03	30.59	35.88	0.00
Farms by Geography	516	5.04	20.16	31.40	43.41	0.00
Family Distribution by Income Level	151,832	20.01	17.41	22.29	40.29	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	56,827	7.43	40.29	34.66	17.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below the Poverty Level	= \$ 30,985 = \$ 46,000 = 15.55%	Median Housing Value Unemployment Rate		= \$ 79,781 = 3.59%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2001 HUD updated MFI.

The Metro Tucson AA consists of a portion of the Tucson, Arizona MSA, which is comprised of Pima County. The AA is defined as the contiguous census tracts within the incorporated and unincorporated areas of the City of Tucson. The AA comprises 90 percent of the population in the Tucson MSA.

NTB operates two full-service offices within the AA. The bank also has two ATMs, one located at each of the two offices. As of June 30, 2001, 17 percent of NTB’s deposits were derived from its offices in this AA. Over the evaluation period, 25 percent of the bank’s home mortgage loans and 34 percent of its small business loans were derived from this AA.

NTB’s deposits in the AA total \$99 million. Based on FDIC deposit market share data as of June 30, 2001, this equates to a 1.52 percent deposit market share and ranks the bank as the 11th largest deposit taking institution in the AA. The data also show that there is strong banking competition in the AA. There are 18 banks in the AA with a total of 149 offices. Together, the top three banks capture 65 percent deposit market share in the AA.

Based on 2000 aggregate data, the competition for home mortgage loans and small business loans is also strong. There are 330 home mortgage loan originators and 77 small business loan originators in the AA. NTB ranks 50th with a market share of 0.45 percent in home mortgage loans, and ranks 19th with a market share of 0.45 percent in small business loans. The top 10 home mortgage loan originators, which capture a combined market share of 44 percent, consist primarily of large nation-wide and regional banks and mortgage companies. The top three small business loan originators, which dominate the AA with a combined market share of 52 percent, are nation-wide credit card banks.

During 2001, the unemployment rate for the AA averaged 3.5 percent, compared to the state unemployment rate of 4.7 percent and the national unemployment rate of 4.8 percent. Major industries include services (44 percent), retail trade (20 percent), finance, insurance, and real estate (10 percent), and construction (9 percent).

As part of the strategic plan approval process, NTB prepared a comprehensive analysis of credit and community development needs and opportunities within the AA. Identified unmet needs include small business loans, flexible loans for affordable housing, and community development loans, investments, and services. Opportunities exist to make affordable housing and small business loans, and to make loans to, invest in, and provide services to various projects, programs, and organizations that have a community development purposes. However, due to the large number of banks and other lenders in the AA, competition for these opportunities is high. Please refer to the bank's current strategic plan in its public file for further details on its analysis of AA needs and opportunities.

Appendix C: Tables of Performance Data

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Tables of Performance Data Compared to Strategic Plan Goals

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Lending

Table 1: 1999 Lending Performance Compared to Goals

Category/AA	Goals		Performance			
	#	\$ (000)	#	% of Goal	\$ (000)	% of Goal
Affordable Mortgage Loans¹	47	3,057	50	106	3,823	138
Metro Phoenix	37	2,540	40	108	2,939	116
Metro Tucson	10	517	10	100	884	171
Small Business Loans²	141	26,504	179	127	33,938	128
Metro Phoenix	97	20,732	121	125	24,597	119
Metro Tucson	44	5,772	58	132	9,341	162
Community Development Loans²	7	2,100	6	86	1,811	86
Metro Phoenix	3	1,000	3	100	1,615	162
Metro Tucson	4	1,100	3	75	196	18
Aggregate Loan Goals	195	31,661	235	121	39,572	125

¹ Affordable mortgage loans represent home mortgage loans to low- or moderate-income individuals and/or low- or moderate-income census tracts.

² Terms as defined in CRA regulation.

Table 2: 2000 Lending Performance Compared to Goals

Category/AA	Goals		Performance			
	#	\$ (000)	#	% of Goal	\$ (000)	% of Goal
Affordable Mortgage Loans¹	50	3,210	68	136	5,335	166
Metro Phoenix	39	2,667	59	151	4,687	176
Metro Tucson	11	543	9	82	648	119
Small Business Loans²	148	27,829	156	105	36,300	130
Metro Phoenix	102	21,769	99	97	23,669	109
Metro Tucson	46	6,060	57	124	12,631	208
Community Development Loans²	8	2,205	8	100	5,701	259
Metro Phoenix	4	1,100	6	150	5,489	499
Metro Tucson	4	1,105	2	50	212	19
Aggregate Loan Goals	206	33,244	232	113	47,336	142

¹ Affordable mortgage loans represent home mortgage loans to low- or moderate-income individuals and/or low- or moderate-income census tracts.

² Terms as defined in CRA regulation.

Table 3: 2001 Lending Performance Compared to Goals – Mortgage Loans¹

Category/AA	Goals		Performance			
	#	\$ (000)	#	% of Goal	\$ (000)	% of Goal
Low- and Moderate-Income Borrowers						
Metro Phoenix	39	2,730	60	154	5,073	186
Metro Tucson	15	975	15	100	1,132	116
Aggregate	54	3,705	75	139	6,205	167
Low- and Moderate-Income Tracts						
Metro Phoenix	17	1,190	16	94	1,225	103
Metro Tucson	8	520	6	75	473	91
Aggregate	25	1,710	22	88	1,698	99

¹ Represents home mortgage loans as defined in CRA regulation.

Table 4: 2001 Lending Performance Compared to Goals – Small Business Loans¹

Category/AA	Goals		Performance			
	#	\$ (000)	#	% of Goal	\$ (000)	% of Goal
Metro Phoenix						
New Loan Total	115	20,450	124	108	30,000	147
\$100,000 or less	66	3,630	56	85	3,023	83
>\$100,000 to \$250,000	24	4,320	28	117	4,708	109
>\$250,000 to \$1,000,000	25	12,500	40	160	22,269	178
Renewed Loan Total	92	16,360	122	133	32,253	197
Total Small Business Loans	207	36,810	246	119	62,253	169
Metro Tucson						
New Loan Total	60	7,730	62	103	11,346	147
\$100,000 or less	37	1,480	33	89	1,714	116
>\$100,000 to \$250,000	15	2,250	15	100	2,636	117
>\$250,000 to \$1,000,000	8	4,000	14	175	6,996	175
Renewed Loan Total	48	6,184	86	179	17,409	282
Total Small Business Loans	108	13,914	148	137	28,755	207
Aggregate						
New Loan Total	175	28,180	186	106	41,346	147
\$100,000 or less	103	5,110	89	86	4,737	93
>\$100,000 to \$250,000	39	6,570	43	110	7,344	112
>\$250,000 to \$1,000,000	33	16,500	54	164	29,265	177
Renewed Loan Total	140	22,544	208	149	49,662	220
Total Small Business Loans	315	50,724	394	125	91,008	179
Aggregate New Loans to Businesses with Revenue <= \$1,000,000	105	15,750	110	105	24,743	157
Aggregate New Loans in Low- or Moderate-Income Census Tracts	28	4,200	30	107	8,106	193

¹ Term as defined in CRA regulation.

Table 5: 2001 Lending Performance Compared to Goals – Community Development Loans¹

AA	Goals		Performance			
	#	\$ (000)	#	% of Goal	\$ (000)	% of Goal
Metro Phoenix	3	1,210	10	333	4,180	345
Metro Tucson	3	1,210	5	167	703	58
Aggregate	6	2,420	15	250	4,883	202

¹ Term as defined in CRA regulation.

Investment

Table 6: 1999-2001 Investment¹ Performance Compared to Goals

Year/Category	Goals \$ (000)	Performance	
		\$ (000)	% of Goal
1999			
Short-Term Investments ²	131	127	97
Long-Term Investments ³	3,700	3,900	105
Total	3,831	4,027	105
2000			
Short-Term Investments ²	138	187	136
Long-Term Investments ³	3,700	9,544	258
Total	3,838	9,731	254
2001			
Short-Term Investments ²	140	179	128
Long-Term Investments ³	7,060	9,639	137
Total	7,200	9,818	136

¹ Qualified Investments, as defined in CRA regulation.

² Short-term investments consist of annual community development grants and deposit in a community development credit union.

³ Long-term investments include municipal bonds supporting low- and moderate-income school districts, affordable housing tax credits, loan pool funds of community development organizations, equity in a small business investment company, and low- and moderate-income mortgage backed securities.

Service

Table 7: 1999-2001 Service¹ Performance Compared to Goals

Year/Category	Goals #	Performance	
		#	% of Goal
1999			
Technical Assistance (hours) ²	424	775	183
Seminars (sessions) ³	10	15	150
2000			
Technical Assistance (hours) ²	466	748	161
Seminars (sessions) ³	11	14	127
2001			
Technical Assistance (hours) ²	700	832	119
Seminars (sessions) ³	15	15	100

¹ Community development services, as defined in CRA regulation.

² Technical assistance provided by bank officers to community-based and other nonprofit organizations involved in affordable housing development, economic development, social services targeted to low- and moderate-income individuals, and other community revitalization initiatives.

³ Seminars on financial literacy, including first-time homeownership and basic banking and credit.